

TIMOTHY J. LEPORE (SBN 13908)
ROPERS MAJESKI PC
 3753 Howard Hughes Pkwy, Suite 200
 Las Vegas, NV 89169
 Telephone: 702.954.8300
 Facsimile: 213.312.2001
 Email: timothy.lepore@ropers.com

Attorneys for Defendant GoodLeap, LLC

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

S. JOHN MASTRANGELO, an individual.

Plaintiff,

v.

GOODLEAP, LLC, a foreign limited-liability
 company; EQUIFAX INFORMATION
 SERVICES, LLC, a foreign limited-liability
 company; EXPERIAN INFORMATION
 SOLUTIONS, INC., a foreign corporation;
 TRANS UNION LLC, a foreign limited-
 liability company,

Defendants.

Case No. 2:21-cv-01539-GMN-NJK

**JOINT STIPULATION FOR
 EXTENSION OF SCHEDULING
 ORDER DEADLINES**

SECOND REQUEST

Complaint Filed: August 19, 2021

Plaintiff S. John Mastrangelo and Defendant GoodLeap, LLC by and through their respective undersigned counsel of record, hereby submit this Joint Stipulation for Extension of Scheduling Order Deadlines to extend the remaining deadlines within the Scheduling Order entered on October 20, 2021, by 30 days. (ECF No. 18.) This Scheduling Order was initially extended, pursuant to the parties' stipulation on or about January 11, 2022 (ECF No. 27.) This is the second such request for an extension of the deadlines in this Scheduling Order.

The parties require additional time for discovery to facilitate the resolution of this action through negotiated settlements, without incurring further costs associated with written discovery. The parties have reached a tentative settlement of this matter and are in the process of negotiating the terms of a written settlement agreement. Accordingly, the parties believes the matter will be resolved within 30 days if the remaining deadlines are extended in order to allow them to do so.

Moreover, by extending these deadlines, it will allow the remaining parties to avoid expending resources that the parties may earmark for settlement. As such, good cause exists for the requested extension.

I. DISCOVERY THAT HAS BEEN COMPLETED

The parties have completed the following discovery:

On October 21, 2021, Plaintiff served his Initial Disclosures under Rule 26(a)(1).

On November 4, 2021, GoodLeap made its Initial Disclosures under Rule 26(a)(1).

On December 3, 2021, Plaintiff served his First Set of Interrogatories, Requests for Production of Documents, and Requests for Admissions on all then-current defendants, namely GoodLeap, Equifax Information Services, LLC (“Equifax”), Experian Information Solutions, Inc. (“Experian”), and Trans Union LLC (“Trans Union”).

On December 7, 2021, Equifax served initial discovery demands on Plaintiff.

On December 8, 2021, Experian served its Initial Disclosures under Rule 26(a)(1).

On January 11, 2022, the Court entered an order, granting Plaintiff and Defendants’ initial Stipulation for Extension of Time regarding Discovery (First Request), extending the deadlines set forth in the Scheduling Order for this matter. (ECF. No. 27.).

On February 2, 8, and 9, 2022, respectively, Experian, Equifax, and Trans Union were dismissed from this matter, with prejudice, pursuant to stipulations between Plaintiff and each such party. (ECF Nos. 29, 32, 33.)

II. DISCOVERY THAT REMAINS TO BE COMPLETED

The following discovery by the parties remains to be completed:

1. Service of and responses to written discovery, and follow-up written discovery, including Interrogatories, Requests for Production and Requests for Admissions, by Plaintiff and Goodleap;
2. Depositions of all witnesses, including Rule 30(b)(6) witnesses, percipient witnesses, and expert witnesses, if any; and

III. REASONS WHY REMAINING DISCOVERY WAS NOT COMPLETED

The parties have reached a tentative agreement, but need additional time to prepare and negotiate the terms of the settlement agreement, and any supplementary documents thereto, to

document the terms of the settlement. The parties are in agreement that it would be more efficient to focus their efforts and resources on finalizing settlement of this action, rather than additional discovery, at this time.

IV. PROPOSED SCHEDULE FOR COMPLETING ALL REMAINING DISCOVERY

The parties hereby stipulate to the following schedule for completing all remaining discovery:

Discovery Cut-Off Date.

The amended discovery cut-off date is **June 13, 2022**.

Dispositive Motions.

The parties shall have until **July 13, 2022** to file dispositive motions, which is 30 days after the close of discovery.

Pretrial Order.

The Joint Pretrial Order shall be filed no later than **August 12, 2022**, which is thirty (30) days after the date set for the filing of dispositive motions. In the event dispositive motions are filed, the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after decision on the dispositive motions or by further order of the Court.

Dated: May 11, 2022

Dated: May 11, 2022

**LAW OFFICE OF
KEVIN L. HERNANDEZ**

ROPERS MAJESKI PC

/s/ Kevin L. Hernandez
Kevin L. Hernandez, Esq. (SBN 12594)
8920 W. Tropicana Avenue, Suite 101
Las Vegas, Nevada 89147
kevin@kevinhernandezlaw.com
Attorney for Plaintiff

/s/ Timothy J. Lepore
Timothy J. Lepore, Esq. (SBN 13908)
3753 Howard Hughes Pkwy, Suite 200
Las Vegas, NV 89169
timothy.lepore@ropers.com
Attorney for Defendant Goodleap, LLC

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: May 12, 2022